 <p>American e - R a t e Solutions</p>	<p>American e-Rate Solutions 26828 Maple Valley HWY, Suite 253, Maple Valley, WA. 98038 206-214-6372</p>
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FCC: Public Notice WC Docket No. 13-184

It is my pleasure to have had this opportunity to share some stories with you concerning the school districts in Washington State and the need to preserve some of the Priority One Eligible Services vs. eliminating them from the fund source.

- American e-Rate Solutions supports the establishment of national bandwidth goals and entity appropriate targets for the E-Rate Program;
- American e-Rate Solutions supports focusing the E-Rate program on broadband connectivity and recommends moving wireless LAN controllers and wireless access points to Priority 1.
- American e-Rate Solutions supports increasing discounts for rural schools and libraries for Priority 1 and Priority 2 to ensure attainment of broadband goals.
- American e-Rate Solutions supports a permanent increase to the funding cap.

Without an increase in the program funding cap, many more schools will fall into the growing “waste-land” called the Opportunity/Achievement Gap. Many schools in Washington State use their reimbursement monies to subsidize their technology budgets. These reimbursement stem mainly from the Priority 1 Eligible Service List –Local Telephone Services, Long Distance Phone Services and Cellular Phone Services, Web Hosting Services.

Washington is the 18th most extensive and the 13th most populous of the 50 United States. Approximately 60 percent of Washington's residents live in the Seattle metropolitan area, the center of transportation, business, and industry along the Puget Sound region of the Salish Sea, an inlet of the Pacific consisting of numerous islands, deep fjords, and bays carved out by glaciers. The remainder of the state consists of deep rainforests in the west, mountain ranges in the west, central, northeast and far southeast, and a semi-arid basin region in the east, central, and south, given over to intensive agriculture. After California, Washington is the second most populous state on the West Coast and in the Western United States.

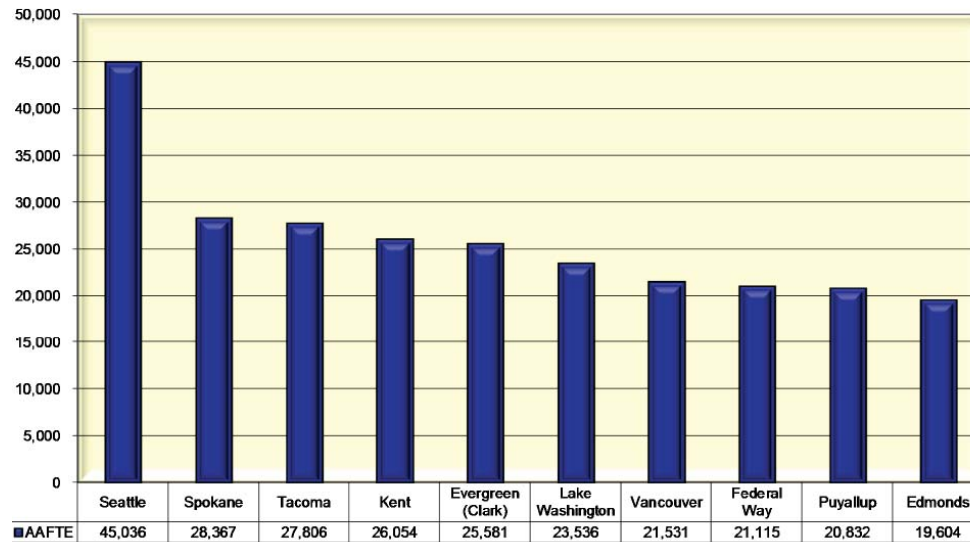
Washington State has benefited from the E-Rate program since the inception of the program in comparison to the three states closest to the population size of Washington State however it has not kept pace with Arizona or Indiana in overall success in the filing process.

Funding Commitment Overview: Indiana Population: 6,483,802					Funding Commitment Overview: Arizona Population: 6,392,017				
Funding Year	State Total	National Total	% Nat. Total	SLD Reports	Funding Year	State Total	National Total	% Nat. Total	SLD Reports
2013	\$55,755,685.25	\$2,009,510,052.35	2.80%	Wave 44	2013	\$55,104,774.72	\$2,009,510,052.35	2.70%	Wave 44
2012	\$56,082,731.94	\$2,868,462,822.79	2.00%	Wave 81	2012	\$84,747,627.51	\$2,868,462,822.79	3.00%	Wave 81
2011	\$43,246,398.92	\$2,667,082,631.60	1.60%	Wave 111	2011	\$68,060,525.49	\$2,667,082,631.60	2.60%	Wave 111
2010	\$42,911,761.58	\$3,117,105,126.82	1.40%	Wave 120	2010	\$82,392,706.93	\$3,117,105,126.82	2.60%	Wave 120
2009	\$37,065,007.26	\$2,888,024,405.24	1.30%	Wave 95	2009	\$79,833,717.62	\$2,888,024,405.24	2.80%	Wave 95
2008	\$30,499,393.93	\$2,534,481,049.94	1.20%	Wave 81	2008	\$68,731,884.52	\$2,534,481,049.94	2.70%	Wave 81
2007	\$36,594,691.35	\$2,421,081,301.24	1.50%	Wave 81	2007	\$61,405,807.70	\$2,421,081,301.24	2.50%	Wave 81
2006	\$28,007,634.92	\$1,962,130,234.06	1.40%	Wave 61	2006	\$55,517,922.92	\$1,962,130,234.06	2.80%	Wave 61
2005	\$26,209,765.37	\$2,067,600,427.53	1.30%	Wave 67	2005	\$39,629,687.87	\$2,067,600,427.53	1.90%	Wave 67
2004	\$18,172,174.77	\$2,180,640,515.62	0.80%	All Waves	2004	\$63,481,537.28	\$2,180,640,515.62	2.90%	All Waves
2003	\$26,096,647.45	\$2,629,689,455.04	1.00%	All Waves	2003	\$70,057,731.54	\$2,629,689,455.04	2.70%	All Waves
2002	\$25,181,180.34	\$2,189,472,317.16	1.20%	All Waves	2002	\$50,456,163.78	\$2,189,472,317.16	2.30%	All Waves
2001	\$22,260,575.91	\$2,181,345,923.20	1.00%	All Waves	2001	\$59,115,394.40	\$2,181,345,923.20	2.70%	All Waves
2000	\$20,810,492.90	\$2,076,769,534.20	1.00%	All Waves	2000	\$47,212,475.02	\$2,076,769,534.20	2.30%	All Waves
1999	\$24,636,068.80	\$2,137,243,271.72	1.20%	All Waves	1999	\$42,217,351.46	\$2,137,243,271.72	2.00%	All Waves
1998	\$21,938,678.77	\$1,694,398,812.78	1.30%	All Waves	1998	\$35,625,736.55	\$1,694,398,812.78	2.10%	All Waves
Funding Commitment Overview: Massachusetts Population: 6,547,629					Funding Commitment Overview: Washington Population: 6,724,540				
Funding Year	State Total	National Total	% Nat. Total	SLD Reports	Funding Year	State Total	National Total	% Nat. Total	SLD Reports
2013	\$22,111,807.89	\$2,009,510,052.35	1.10%	Wave 44	2013	\$28,543,703.19	\$2,009,510,052.35	1.40%	Wave 44
2012	\$32,491,319.23	\$2,868,462,822.79	1.10%	Wave 81	2012	\$41,416,134.05	\$2,868,462,822.79	1.40%	Wave 81
2011	\$29,264,155.00	\$2,667,082,631.60	1.10%	Wave 111	2011	\$41,629,237.99	\$2,667,082,631.60	1.60%	Wave 111
2010	\$32,999,132.52	\$3,117,105,126.82	1.10%	Wave 120	2010	\$36,395,942.99	\$3,117,105,126.82	1.20%	Wave 120
2009	\$38,587,084.79	\$2,888,024,405.24	1.30%	Wave 95	2009	\$37,611,279.76	\$2,888,024,405.24	1.30%	Wave 95
2008	\$30,984,529.87	\$2,534,481,049.94	1.20%	Wave 81	2008	\$35,494,191.51	\$2,534,481,049.94	1.40%	Wave 81
2007	\$29,162,436.18	\$2,421,081,301.24	1.20%	Wave 81	2007	\$29,507,546.53	\$2,421,081,301.24	1.20%	Wave 81
2006	\$27,529,490.60	\$1,962,130,234.06	1.40%	Wave 61	2006	\$20,406,373.25	\$1,962,130,234.06	1.00%	Wave 61
2005	\$26,264,308.31	\$2,067,600,427.53	1.30%	Wave 67	2005	\$20,378,580.50	\$2,067,600,427.53	1.00%	Wave 67
2004	\$25,428,578.06	\$2,180,640,515.62	1.20%	All Waves	2004	\$20,315,096.34	\$2,180,640,515.62	0.90%	All Waves
2003	\$27,911,690.82	\$2,629,689,455.04	1.10%	All Waves	2003	\$22,048,475.69	\$2,629,689,455.04	0.80%	All Waves
2002	\$39,422,386.38	\$2,189,472,317.16	1.80%	All Waves	2002	\$18,488,069.00	\$2,189,472,317.16	0.80%	All Waves
2001	\$43,652,340.13	\$2,181,345,923.20	2.00%	All Waves	2001	\$19,051,006.29	\$2,181,345,923.20	0.90%	All Waves
2000	\$46,054,378.49	\$2,076,769,534.20	2.20%	All Waves	2000	\$18,530,294.95	\$2,076,769,534.20	0.90%	All Waves
1999	\$35,317,179.10	\$2,137,243,271.72	1.70%	All Waves	1999	\$34,565,236.79	\$2,137,243,271.72	1.60%	All Waves
1998	\$30,089,620.35	\$1,694,398,812.78	1.80%	All Waves	1998	\$28,294,272.77	\$1,694,398,812.78	1.70%	All Waves

The top 10 largest school districts in our state:

Benchmarking

**Student Enrollment 2010-2011
AAFTE as of May 2011**



AAFTE: Annualized Average Full Time Equivalent student
Source: Source: OSPI P223 data file (ties to Reports 1251 & 1251H, dated Jan. 2, 2012)

Seattle School District [BEN: 145192], located in the Puget Sound Area of Washington State, averages about \$501,000.00 dollars per year in P1 E-Rate Funding. They have also been funded eight [8] times in 16 years for P2 funding for a total of \$7,351.106. 00 dollars. The last time they received P2 funding was Fund Year 2011. Their District Discount percentage has ranged from 62% [1998] - currently 61%. %. This P2 funding was for select schools only, not a District as a whole.

Spokane School District [BEN: 145503], located in eastern Washington near the Washington/Idaho border, averages about \$522,000.00 dollars per year in P1 E-Rate Funding. They have been funded eight [8] times within the past 16 years for P2 funding for a total of \$4,420,000.00 dollars. The last time they received P2 funding was Fund Year 2012. Their District Discount percentage has ranged from 66% [1998] - currently 72%. %. This P2 funding was for select schools only, not a District as a whole.

Tacoma School District [BEN: 145279], located in the South Puget Sound area, averages \$201,000.00 dollars per year in P1 E-Rate Funding. They have been funded nine [9] times in the past 16 years for a total of \$35, 071, 00.00 dollars. The last time they received P2 funding was Fund Year 2012. Their District Discount percentage has ranged from 66% [1998] - currently 77%. This P2 funding was for select schools only, not a District as a whole.

Kent School District [BEN: 145180], located in the Greater Puget Sound area, averages \$385,153.00 dollars per year in P1 E-Rate Funding. They have been funded two [2] times in the past 16 years for a total of \$ 20,317,564.00 dollars. The last time they received P2 funding was Fund Year 2005. Their District Discount percentage has ranged from 48% [1998] - currently 64%.

Evergreen School District [BEN: 145369], located in the south Washington, along the Columbia River area, averages \$318,366.00 dollars per year in P1 E-Rate Funding. They have been funded two [2] times in the past 16 years for a total of \$ 1,282,000.00 dollars. The last time they received P2 funding was Fund Year 2005. Their District Discount percentage has ranged from 48% [1998] - currently 70%. This P2 funding was for select schools only, not a District as a whole.

Lake Washington School District [BEN: 145189], located in the Puget Sound Area of Washington, averages \$186,079.00 dollars per year in P1 E-Rate Funding. They have been funded zero [0] times in the past 16 years. Their District Discount percentage has ranged from 40% [1998] - currently 41%.

Vancouver School District [BEN: 145370], located in the south Washington, along the Columbia River area, averages \$226,952.00 dollars per year in P1 E-Rate Funding. They have been funded five [5] times in the past 16 years for P2 funding for a total of \$ 1,917,000.00 dollars. The last time they received P2 funding was Fund Year 2003. Their District Discount percentage has ranged from 50% [1998] - currently 71%. This P2 funding was for select schools only, not a District as a whole.

Federal Way School District [BEN: 145173], located in the south Puget Sound area, averages \$446,781.00 dollars per year in P1 E-Rate Funding. They have been funded three [3] times in the past 16 years for P2 funding for a total of \$ 815,407.00 dollars. The last time they received P2 funding was Fund Year 2010. Their District Discount percentage has ranged from 51% [1999] - currently 74%. This P2 funding was for select schools only, not a District as a whole.

Puyallup School District [BEN: 145268], located in the south Puget Sound area, averages \$349,657.00 dollars per year in P1 E-Rate Funding. They did not begin filing for E-Rate funding until Fund Year 2002. They have never applied for P2 funding. Their District Discount percentage has ranged from 43% [2002] - currently 55%.

Edmunds School District [BEN: 145182], located in the greater Puget Sound area, averages \$154,560.00 dollars per year in P1 E-Rate Funding. They have been funded 1 [1] times in the past 16 years for P2 funding for a total of \$ 203,735.00 dollars. The last time they received P2 funding was Fund Year 2010. Their District Discount percentage has ranged from 47% [1998] - currently 58%. This P2 funding was for select schools only, not a District as a whole.

Summary of top 10 largest school districts in Washington State.

These schools utilize the E-Rate funding program to help reduce the costs for their Telecommunication service needs, and Internet Services. Without the P1 eligible services that they are receiving currently, they will be forced to make reductions on services and perhaps employees. Some of these districts take part in the K-20 Network for their Internet connection, but some however do not – they have chosen to seek their own Internet service providers for two reasons –

1) Cheaper cost overall 2) they get their discount percentage and do not have to pay an administrative fee for being a part of a consortium. They have analyzed the facts and for districts with a higher discount percentage then the K-20 Network [currently at 66%] they can get a greater savings not participating in the consortium program. They also can have more control over the upload/download speeds provided by the service providers and can reduce the bottle neck at the demark.

Other smaller school district's stories:

Mukilteo School District: Ben 145201

"If the following Priority 1- e-Rate funding is reduced or eliminated, Mukilteo School District would lose the following: Please note that this school district has never been approved for any P2 funding. Their discount percentage is on average 65%. "

Cellular phone services \$3,101
Telephone services \$65,004
Web Hosting services \$18,229
TOTAL \$86,334

Josette A. Baines

Applicant: MUKILTEO SCHOOL DISTRICT 6
Billed Entity: 145201

FY	Req. FRNs	Funded FRNs	486 on File	Requested Amount	Committed Priority 1	Committed Priority 2	Total Committed	Total Disbursed	Remaining Balance	UHL %
2014	5	0	0	\$137,565.33	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	0%
2013	6	6	6	\$139,027.21	\$139,027.21	\$0.00	\$139,027.21	\$76,911.34	\$62,115.87	55%
2012	7	7	7	\$135,615.47	\$135,615.47	\$0.00	\$135,615.47	\$125,191.86	\$10,423.61	92%
2011	7	7	7	\$132,963.89	\$132,963.89	\$0.00	\$132,963.89	\$124,482.21	\$8,481.68	94%
2010	8	8	8	\$97,090.82	\$97,090.82	\$0.00	\$97,090.82	\$96,764.54	\$326.28	100%
2009	9	9	9	\$171,364.93	\$171,364.93	\$0.00	\$171,364.93	\$131,669.56	\$39,695.37	77%
2008	10	10	10	\$168,357.66	\$168,357.66	\$0.00	\$168,357.66	\$156,558.76	\$11,798.90	93%
2007	13	13	13	\$160,424.57	\$159,383.78	\$0.00	\$159,383.78	\$156,014.50	\$3,369.28	98%
2006	9	9	9	\$128,632.76	\$126,488.86	\$0.00	\$126,488.86	\$121,310.65	\$5,178.21	96%
2005	9	9	9	\$136,113.56	\$135,834.97	\$0.00	\$135,834.97	\$133,765.19	\$2,069.78	98%
2004	7	7	7	\$121,834.06	\$20,305.68	\$0.00	\$20,305.68	\$18,936.63	\$1,369.05	93%
2003	8	7	7	\$123,669.46	\$107,794.39	\$0.00	\$107,794.39	\$104,310.07	\$3,484.32	97%
2002	8	6	6	\$107,967.82	\$96,020.90	\$0.00	\$96,020.90	\$92,587.03	\$3,433.87	96%
2001	8	8	8	\$104,732.59	\$102,616.85	\$0.00	\$102,616.85	\$99,457.85	\$3,159.00	97%
2000	8	6	6	\$80,397.88	\$71,014.59	\$0.00	\$71,014.59	\$69,932.93	\$1,081.66	98%
1999	10	7	7	\$102,121.34	\$79,921.95	\$0.00	\$79,921.95	\$76,567.41	\$3,354.54	96%
1998*	11	6	6	\$67,152.36	\$75,281.47	\$0.00	\$75,281.47	\$75,281.47	\$0.00	100%

The Mukilteo School District is located in the greater Puget Sound area, north of Seattle, Washington. The Mukilteo School District has never benefited from the P2 funding. Their average District Discount Percentage ranges from 48% [1998] to 65% currently.

Mount Baker School District: Ben 145216

"We cannot qualify for P2. The numbers never get low enough for our 76%.

We get funded for:

- our WAN connections
- our long distance, B1 phone lines, and cost of service

Our reimbursement is about \$45,000 per year.

We have a modern phone system but have chosen to keep our investment in telephones and have not moved to VOIP systems but have a hybrid system of analog and digital phone sets.

In our rural area the best we can get to two of our schools is ten megabit WAN service. Anything else is too expensive.”

Mark Challender, Mount Baker School District

Applicant: MOUNT BAKER SCHOOL DIST 507
Billed Entry: 145216

FY	Req. FRNs	Funded FRNs	406 on File	Requested Amount	Committed Priority 1	Committed Priority 2	Total Committed	Total Disbursed	Remaining Balance	Util. %
2014	7	0	0	\$46,801.79	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	0%
2013	6	6	6	\$39,396.19	\$39,396.19	\$0.00	\$39,396.19	\$0.00	\$39,396.19	0%
2012	4	4	4	\$44,478.50	\$44,478.50	\$0.00	\$44,478.50	\$39,025.48	\$5,453.02	88%
2011	7	4	4	\$166,508.57	\$46,496.56	\$0.00	\$46,496.56	\$45,201.62	\$1,294.94	97%
2010	5	3	3	\$53,300.60	\$40,130.37	\$0.00	\$40,130.37	\$36,775.50	\$3,354.87	92%
2009	3	3	3	\$35,481.07	\$35,481.07	\$0.00	\$35,481.07	\$32,761.51	\$2,719.56	92%
2008	3	3	3	\$27,383.25	\$35,925.27	\$0.00	\$35,925.27	\$32,767.77	\$3,157.50	91%
2007	2	2	2	\$51,525.90	\$47,403.83	\$0.00	\$47,403.83	\$33,924.81	\$13,479.02	72%
2006	16	1	1	\$218,577.92	\$36,304.32	\$0.00	\$36,304.32	\$35,963.00	\$341.32	99%
2005	1	1	1	\$39,719.06	\$36,060.72	\$0.00	\$36,060.72	\$36,060.72	\$0.00	100%
2004	0	0	0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	0%
2003	1	1	1	\$34,447.86	\$20,635.94	\$0.00	\$20,635.94	\$20,635.94	\$0.00	100%
2002	0	0	0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	0%
2001	8	1	1	\$98,384.41	\$36,240.91	\$0.00	\$36,240.91	\$30,958.95	\$5,281.96	85%
2000	6	1	1	\$81,586.90	\$35,636.90	\$0.00	\$35,636.90	\$33,294.17	\$2,342.73	93%
1999	5	5	3	\$65,361.54	\$23,049.74	\$42,311.80	\$65,361.54	\$27,854.40	\$37,507.14	43%
1998*	12	3	3	\$140,818.04	\$36,066.24	\$18,086.40	\$54,152.64	\$48,601.45	\$7,551.19	86%

The Mount Baker School District is located east of Bellingham, Washington in the Cascade Foothills. The received P2 funding one [1] time in 1999. They have not filed for P2 funding since. Their average District Discount Percentage ranges from 50% [1998] to 67% currently.

Newport School District: BEN: 145484

“I do have a few concerns about erate and what it was originally intended to do. I work for a small school district and we work very hard to provide our students and staff with the technology they need and would expect in a larger district. Over the past few years it appears the "pot" of money is diminishing when in fact it has grown. One of the primary culprits is the broad interpretation of the rules and it appears with the proposed changes (more funding for VoIP and less for POT's) that we are going to exacerbate the problem. We started with funding basic phone service (POT's) and internet connectivity and have moved to covering more expensive technologies like hosted internet connectivity with VoIP services. Most of the time the later services are not even available to rural areas but that is what some of the larger districts and service providers are pushing for, so once again the little districts will be the ones left out when all is said and done. This also means that some of us, even at the 80% plus funding level will never see Priority 1 & 2 funding ever again.

I would like to see the program changed to something that allows the smaller, more rural districts to be able to compete for the dollars they need to implement and sustain technology within their district. Each district needs a base level of funding just to sustain what it has. Then a program needs to be established that allows those that are on the low end of technology to make strides to catch-up but in a sustainable manner. New and innovative programs are not good for everyone unless they can be built to scale for all and are sustainable by all not just the bigger districts.

In short proposed changes to eliminate or reduce basic funding (Cellular phone services, Long Distance Phone Services, Centrex Phone services, Web Hosting Services, Paging Services) would have a direct negative impact on those of us in rural areas. I do believe we need to change the model but again basic

funding should be considered first and foremost. New and innovative programs are a distant second unless they are truly scalable, sustainable and affordable for all.”

Steve Shumski
CTE/Technology Director
Newport School District
Post Office Box 70
1380 West 5th Street
Newport, WA 99156

Applicant: NEWPORT SCHOOL DIST 56-415
Billed Entity: 145484

FY	Req. FRNs	Funded FRNs	486 on File	Requested Amount	Committed Priority 1	Committed Priority 2	Total Committed	Total Disbursed	Remaining Balance	Util. %
2014	4	0	0	\$71,734.49	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	0%
2013	3	3	3	\$12,546.53	\$12,546.53	\$0.00	\$12,546.53	\$0.00	\$12,546.53	0%
2012	4	0	0	\$51,616.03	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	0%
2011	5	3	0	\$64,466.30	\$18,513.60	\$0.00	\$18,513.60	\$0.00	\$18,513.60	0%
2010	4	4	3	\$57,877.24	\$19,294.51	\$33,820.53	\$53,115.04	\$14,969.67	\$38,145.37	28%
2009	33	33	33	\$534,287.71	\$23,301.23	\$511,572.02	\$534,873.25	\$530,080.94	\$4,792.31	99%
2008	33	4	4	\$521,776.46	\$26,993.53	\$0.00	\$26,993.53	\$21,393.04	\$5,600.49	79%
2007	22	3	3	\$438,121.65	\$10,474.90	\$0.00	\$10,474.90	\$10,425.49	\$49.41	100%
2006	38	3	3	\$409,490.79	\$23,040.00	\$0.00	\$23,040.00	\$20,393.97	\$2,646.03	89%
2005	0	0	0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	0%
2004	0	0	0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	0%
2003	0	0	0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	0%
2002	7	5	5	\$102,240.00	\$24,068.83	\$0.00	\$24,068.83	\$23,158.06	\$910.77	96%
2001	0	0	0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	0%
2000	7	5	5	\$102,720.00	\$29,839.97	\$0.00	\$29,839.97	\$24,056.64	\$5,783.33	81%
1999	8	8	8	\$63,360.00	\$40,320.00	\$36,000.00	\$76,320.00	\$50,947.19	\$25,372.81	67%
1998*	11	11	11	\$241,364.00	\$36,361.60	\$207,058.40	\$243,420.00	\$217,949.41	\$25,470.59	90%

The Newport School District is located in eastern Washington State, north of Spokane, Washington, along the Idaho border. They received P2 funding four [4] times since 1999. Their average District Discount Percentage ranges from 80% [1998] to 80% currently.

Pullman School District: BEN: 145491

“For the Pullman SD, the impact will be quite drastic. Reduction of supporting funds does not make the need for such services go away. We still require and depend on these services. They will still need to be funded but at the cost of an IT staff position. The tumble down effect means less capacity to support the environment teachers have come to rely on, less support in the school and a direct impact in the classroom and to the student.

As a medium district speaking for must smaller districts, these funds equal the playing field for students in under-served school district. What is drastic to me will be devastating to smaller district.”

Garren Shannon, MS, PMP
Director Information Systems
Teacher - Pullman High School

Applicant: PULLMAN SCHOOL DISTRICT 267
 Billed Entry: 145491

FY	Req. FRNs	Funded FRNs	486 on File	Requested Amount	Committed Priority 1	Committed Priority 2	Total Committed	Total Disbursed	Remaining Balance	URL %
2013	6	0	0	\$43,816.34	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	0%
2012	5	5	5	\$34,253.47	\$33,222.45	\$0.00	\$33,222.45	\$0.00	\$33,222.45	0%
2012	5	5	5	\$39,188.21	\$39,188.21	\$0.00	\$39,188.21	\$36,524.92	\$2,663.29	92%
2011	5	5	5	\$39,386.18	\$35,230.37	\$0.00	\$35,230.37	\$35,230.37	\$0.00	100%
2010	3	3	3	\$21,021.01	\$22,202.05	\$0.00	\$22,202.05	\$21,888.57	\$313.48	99%
2009	4	4	4	\$24,191.39	\$22,814.74	\$0.00	\$22,814.74	\$20,661.57	\$2,153.17	91%
2008	4	4	4	\$43,850.11	\$42,934.48	\$0.00	\$42,934.48	\$21,232.51	\$21,701.97	49%
2007	0	0	0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	0%
2006	6	6	6	\$28,323.14	\$31,573.15	\$0.00	\$31,573.15	\$28,323.14	\$3,250.01	90%
2005	0	0	0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	0%
2004	5	5	5	\$25,854.53	\$25,854.53	\$0.00	\$25,854.53	\$0.00	\$25,854.53	0%
2003	3	3	3	\$19,986.48	\$19,986.48	\$0.00	\$19,986.48	\$9,425.52	\$10,560.96	47%
2002	1	1	1	\$8,352.00	\$8,352.00	\$0.00	\$8,352.00	\$0.00	\$8,352.00	0%
2001	3	3	3	\$20,608.56	\$20,608.56	\$0.00	\$20,608.56	\$0.00	\$20,608.56	0%
2000	3	3	3	\$24,276.48	\$20,742.33	\$0.00	\$20,742.33	\$7,725.20	\$13,017.13	37%
1999	3	3	3	\$34,545.60	\$33,978.60	\$0.00	\$33,978.60	\$27,498.00	\$6,480.60	81%
1998*	6	4	4	\$49,911.22	\$34,799.72	\$0.00	\$34,799.72	\$28,820.16	\$5,979.56	83%

The Pullman School District is located in eastern Washington State, south of Spokane, Washington, along the Idaho border. They have never applied for P2 funding. Their average District Discount Percentage ranges from 56% [1998] to 61% currently.

Northshore School District: BEN: 145175

“Well, it is a hit directly to our General Fund, which pays for teachers, librarians, nurses, and other school staff and school supplies. Without that funding, we will have to make further cuts somewhere else. With the exception of some cell phone services, we are already using the minimum we can get away with on these services.

We need long distance because over 30% of our calls to parents are long distance, partly because our district crosses phone boundaries but also a good part because so many parents have cell phones originating outside of our area. Local phone service is also at a minimum, to the point where we run out of available lines every day around lunch time and around the end of school. It is a real problem on days when anything special happens, especially if there is an unexpected snow storm and all parents are calling in to get their kids. We can't afford to add more lines, though.

We are a relatively "wealthy" district, though, compared to most of them in Washington. We backfill a lot of our technology costs from our Levy, which frees up more of the General Fund. This kind of change would be a huge hit to a district that didn't have Levy funds to help out.”

Jon Wiederspan
 Manager, Network and Computing Services
 Northshore School District

Applicant: NORTHSHORE SCHOOL DISTRICT 417
Billed Entity: 145175

FY	Req. FRNs	Funded FRNs	406 on File	Requested Amount	Committed Priority 1	Committed Priority 2	Total Committed	Total Disbursed	Remaining Balance	Util. %
2014	5	0	0	\$66,187.94	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	0%
2013	6	6	6	\$73,818.81	\$73,818.81	\$0.00	\$73,818.81	\$4,644.00	\$69,174.81	6%
2012	5	5	5	\$64,381.25	\$64,381.25	\$0.00	\$64,381.25	\$58,075.75	\$6,305.50	90%
2011	0	0	0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	0%
2010	0	0	0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	0%
2009	0	0	0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	0%
2008	1	1	1	\$19,532.60	\$17,205.54	\$0.00	\$17,205.54	\$0.00	\$17,205.54	0%
2007	2	2	2	\$51,134.45	\$49,423.32	\$0.00	\$49,423.32	\$0.00	\$49,423.32	0%
2006	4	4	4	\$61,995.51	\$64,026.77	\$0.00	\$64,026.77	\$14,981.77	\$49,045.00	23%
2005	4	4	4	\$62,328.53	\$62,328.53	\$0.00	\$62,328.53	\$0.00	\$62,328.53	0%
2004	3	3	3	\$97,336.77	\$97,336.77	\$0.00	\$97,336.77	\$42,773.13	\$54,563.64	44%
2003	3	3	3	\$112,692.90	\$111,485.53	\$0.00	\$111,485.53	\$102,707.76	\$8,777.77	92%
2002	4	3	3	\$117,841.82	\$106,342.99	\$0.00	\$106,342.99	\$105,984.40	\$358.59	100%
2001	3	3	3	\$119,092.84	\$118,836.28	\$0.00	\$118,836.28	\$87,387.05	\$31,449.23	74%
2000	1	1	1	\$118,193.50	\$115,623.89	\$0.00	\$115,623.89	\$34,657.61	\$80,966.28	30%
1999	2	2	2	\$123,095.37	\$120,830.83	\$0.00	\$120,830.83	\$120,830.83	\$0.00	100%
1998*	33	6	4	\$297,409.17	\$151,226.32	\$0.00	\$151,226.32	\$69,283.33	\$81,942.99	46%

The Northshore School District is located in the greater Puget Sound Area. They have never applied for P2 funding. Their average District Discount Percentage ranges from 40% [1998] to 43% currently. They missed out on getting funding from the E-Rate program for three [3] consecutive years due to lack of staff on hand to file for the funding and lack of knowledge of how to file for the funding. In Fund Year 2012, they hired Puget Sound ESD to help them file for E-Rate funding.

Orting School District: BEN: 145261

“We will never receive Priority 2 funding opportunities and we have a limited budget for any infrastructure updates that are needed to use a wireless system throughout our school district.”

Jason Rudolph
Director of Technology
Orting School District

Applicant: ORTING SCHOOL DISTRICT 344
Billed Entity: 145261

FY	Req. FRNs	Funded FRNs	406 on File	Requested Amount	Committed Priority 1	Committed Priority 2	Total Committed	Total Disbursed	Remaining Balance	Util. %
2014	6	0	0	\$30,171.85	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	0%
2013	5	5	5	\$28,530.06	\$27,331.71	\$0.00	\$27,331.71	\$0.00	\$27,331.71	0%
2012	4	4	4	\$24,408.00	\$24,408.00	\$0.00	\$24,408.00	\$23,258.99	\$1,149.01	95%
2011	6	5	5	\$28,403.00	\$24,777.24	\$0.00	\$24,777.24	\$22,385.69	\$2,391.55	90%
2010	1	1	1	\$16,548.48	\$16,548.48	\$0.00	\$16,548.48	\$15,237.25	\$1,311.23	92%
2009	1	1	1	\$14,772.00	\$14,772.00	\$0.00	\$14,772.00	\$14,234.89	\$537.11	96%
2008	1	1	1	\$11,136.18	\$11,847.00	\$0.00	\$11,847.00	\$11,847.00	\$0.00	100%
2007	1	1	1	\$11,285.30	\$11,285.30	\$0.00	\$11,285.30	\$11,196.19	\$89.11	99%
2006	1	1	1	\$10,956.00	\$10,956.00	\$0.00	\$10,956.00	\$10,956.00	\$0.00	100%
2005	1	1	1	\$11,071.14	\$11,071.14	\$0.00	\$11,071.14	\$11,071.14	\$0.00	100%
2004	1	1	1	\$10,836.00	\$10,836.00	\$0.00	\$10,836.00	\$9,116.26	\$1,719.74	84%
2003	1	1	1	\$14,306.40	\$10,408.73	\$0.00	\$10,408.73	\$10,149.21	\$259.52	98%
2002	0	0	0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	0%
2001	0	0	0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	0%
2000	3	1	1	\$35,879.80	\$11,280.00	\$0.00	\$11,280.00	\$0.00	\$11,280.00	0%
1999	4	2	1	\$41,871.36	\$9,813.60	\$0.00	\$9,813.60	\$0.00	\$9,813.60	0%
1998*	10	3	3	\$79,446.90	\$15,059.00	\$0.00	\$15,059.00	\$6,720.80	\$8,338.20	45%

The Orting School District is located at the base of Mount Rainier, in the south Puget Sound area. They have never applied for P2 funding. Their average District Discount Percentage ranges from 50% [1998] to 57% currently. They missed out on getting funding from the E-Rate program for two [2] consecutive years due to lack of staff on hand to file for the funding and lack of knowledge of how to file for the funding. In Fund Year 2012, they hired Puget Sound ESD to help them file for E-Rate funding.

White Salmon Valley School District: BEN: 145373

"White Salmon Valley School District is a small rural district in SW Washington in the Columbia River Gorge. The reduction or elimination of funding for basic services would have a great impact on us. This funding we have received over the years has been of great value. We do have an older phone system and we need to make upgrades, but we have not had the funding to do so. I would hope the FCC would consider the overall impact too many districts if this support was eliminated."

Thank you,

Jerry

Dr. Jerry Lewis, Superintendent
White Salmon Valley Schools

Applicant: WHITE SALMON VLY DIST 405-17
Billed Entity: 145373

FY	Req. FRNs	Funded FRNs	406 on File	Requested Amount	Committed Priority 1	Committed Priority 2	Total Committed	Total Disbursed	Remaining Balance	UHL %
2014	5	0	0	\$30,795.26	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	0%
2013	5	5	5	\$28,985.91	\$28,985.91	\$0.00	\$28,985.91	\$0.00	\$28,985.91	0%
2012	4	4	4	\$20,592.63	\$20,592.63	\$0.00	\$20,592.63	\$17,700.41	\$2,892.22	86%
2011	4	4	4	\$19,739.13	\$19,739.13	\$0.00	\$19,739.13	\$19,192.46	\$546.67	97%
2010	4	4	4	\$20,804.79	\$20,515.94	\$0.00	\$20,515.94	\$19,372.15	\$1,143.79	94%
2009	3	3	3	\$20,239.67	\$19,621.79	\$0.00	\$19,621.79	\$19,590.23	\$31.56	100%
2008	3	3	3	\$19,487.44	\$19,487.44	\$0.00	\$19,487.44	\$19,298.67	\$188.77	99%
2007	3	3	3	\$14,329.95	\$14,329.95	\$0.00	\$14,329.95	\$14,329.95	\$0.00	100%
2006	3	3	3	\$14,127.22	\$14,127.22	\$0.00	\$14,127.22	\$14,127.22	\$0.00	100%
2005	3	3	3	\$14,246.81	\$14,246.81	\$0.00	\$14,246.81	\$13,059.57	\$1,187.24	92%
2004	3	3	3	\$14,124.52	\$14,124.52	\$0.00	\$14,124.52	\$14,124.52	\$0.00	100%
2003	3	3	3	\$15,838.17	\$13,291.38	\$0.00	\$13,291.38	\$13,291.38	\$0.00	100%
2002	3	3	3	\$13,045.20	\$13,045.20	\$0.00	\$13,045.20	\$13,045.20	\$0.00	100%
2001	3	3	3	\$13,440.00	\$13,440.00	\$0.00	\$13,440.00	\$12,332.07	\$1,107.93	92%
2000	3	3	3	\$12,516.00	\$11,443.15	\$0.00	\$11,443.15	\$9,477.77	\$1,965.38	83%
1999	3	3	3	\$11,835.60	\$11,835.60	\$0.00	\$11,835.60	\$10,915.99	\$919.61	92%
1998*	5	5	5	\$26,743.53	\$26,743.53	\$0.00	\$26,743.53	\$18,471.26	\$8,272.27	69%

The White Salmon Valley School District is located along the Columbia River in south eastern Washington. They have never applied for P2 funding. Their average District Discount Percentage ranges from 70% [1998] to 77% currently.

Onion Creek School District BEN: 145463

"As a small district we have been very dependent on erate support for basic phone service, long distance phone service and web hosting. We have over 70% F&R so qualify for 90% match. If we lost this, and tried to fund it from our general fund, we would lose over \$3000 a year which would cut into our already low tech budget. I think it would drastically affect us at Onion Creek. Hope other districts agreed with me and were heard."

Joel

Joel Anderson
Technology Coordinator
Onion Creek School
2006 Lotze Creek Road
Colville, WA 99114

Applicant: UNION CREEK SCHOOL DISTRICT 30
Billed Entity: 145463

FY	Req. FRNs	Funded FRNs	406 on File	Requested Amount	Committed Priority 1	Committed Priority 2	Total Committed	Total Disbursed	Remaining Balance	Util. %
2014	3	0	0	\$4,355.76	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	0%
2013	2	2	2	\$4,143.83	\$4,143.83	\$0.00	\$4,143.83	\$650.25	\$3,493.58	16%
2012	2	2	2	\$3,756.35	\$3,756.35	\$0.00	\$3,756.35	\$450.04	\$3,306.31	12%
2011	2	2	2	\$3,175.85	\$3,175.85	\$0.00	\$3,175.85	\$2,725.81	\$450.04	86%
2010	4	4	4	\$4,187.95	\$3,289.25	\$797.05	\$4,086.30	\$3,764.43	\$321.87	92%
2009	4	3	3	\$3,416.35	\$3,016.32	\$0.00	\$3,016.32	\$2,398.75	\$617.57	80%
2008	6	4	4	\$9,588.98	\$3,134.28	\$0.00	\$3,134.28	\$2,076.43	\$1,057.85	66%
2007	3	3	3	\$3,206.40	\$3,206.40	\$0.00	\$3,206.40	\$3,046.51	\$159.89	95%
2006	2	2	2	\$3,194.60	\$3,194.60	\$0.00	\$3,194.60	\$2,649.21	\$545.39	83%
2005	5	4	4	\$4,614.03	\$3,103.71	\$1,098.29	\$4,202.00	\$3,676.06	\$525.94	87%
2004	4	4	3	\$7,253.09	\$2,799.27	\$0.00	\$2,799.27	\$897.94	\$1,901.33	32%
2003	6	6	6	\$8,293.88	\$3,184.65	\$4,472.30	\$7,656.95	\$5,616.13	\$2,040.82	73%
2002	0	0	0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	0%
2001	2	2	2	\$2,736.00	\$2,736.00	\$0.00	\$2,736.00	\$2,160.00	\$576.00	79%
2000	0	0	0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	0%
1999	7	7	7	\$18,735.62	\$3,158.40	\$15,577.22	\$18,735.62	\$13,821.86	\$4,913.76	74%
1998*	0	0	0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	0%

The Union Creek School District is located in a very rural northern section of Stevens County in Washington State. They have received P2 funding four [4] times within the past 16 years. Their average District Discount Percentage ranges from 80% [1999] to 90% currently.

Auburn School District: BEN: 145171

Items that impact Auburn SD the most, related to the items listed below:

- 1) We echo the comments related to creating areas of "haves and have nots", because of the way the funding is allocated. The focus on the poverty schools, while extremely worthwhile, does not allow the organization to provide equity for all - when you consider E-rate funding. Equity is important and consistency of funding levels
- 2) Emphasis and prioritization on infrastructure replacements in support of broadband access (wireless services). Internal connections are the restricting factor for us. We don't have enough, everywhere, all the time. The impact of Common Core and Smarter Balance is a bandwidth freight train.
- 3) Reducing the reimbursement or priority of analog telephone services may be a good idea IF you take into account that many legacy systems that protect the schools need/require/recommend analog telephone services (i.e. fire alarm, security services). The districts around us, including us, rely on normal business lines for these services because they "just work" when they must. If you mess with this priority, it may push the districts to make these digital phone systems and, as a result, cause collateral damage (i.e. costs). Replacing fire alarm/security systems are extremely costly. I suspect E-rate won't pay for that. This will be another cost for the local taxpayer.
- 4) The budget for E-rate needs to be increased to the point to make Priority 2 worth the time needed to file for it.

Jennifer Clouser, CETL

Assistant Director and Chief Technical Advisor Innovation, Engineering, Deployment and Support
Department of Information Technology Auburn School District #408

915 4th Street Northeast

Auburn, WA 98002

Applicant: AUBURN SCHOOL DISTRICT 408
Billed Entity: 145171

FY	Req. FRNs	Funded FRNs	486 on File	Requested Amount	Committed Priority 1	Committed Priority 2	Total Committed	Total Disbursed	Remaining Balance	UOL %
2014	8	0	0	\$470,660.25	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	0%
2013	9	9	9	\$473,562.46	\$473,562.46	\$0.00	\$473,562.46	\$0.00	\$473,562.46	0%
2012	13	10	10	\$737,671.05	\$470,621.60	\$0.00	\$470,621.60	\$435,660.47	\$34,961.13	93%
2011	10	10	10	\$471,728.20	\$471,728.20	\$0.00	\$471,728.20	\$402,041.14	\$69,687.06	85%
2010	11	11	11	\$883,998.56	\$703,866.79	\$180,131.77	\$883,998.56	\$743,665.49	\$140,333.07	84%
2009	6	6	6	\$224,776.78	\$224,776.78	\$0.00	\$224,776.78	\$219,088.98	\$5,687.80	97%
2008	5	5	5	\$204,894.01	\$204,894.01	\$0.00	\$204,894.01	\$142,258.91	\$62,635.10	69%
2007	4	4	4	\$137,438.07	\$137,106.87	\$0.00	\$137,106.87	\$118,902.29	\$18,204.58	87%
2006	22	22	22	\$121,550.99	\$121,106.94	\$0.00	\$121,106.94	\$72,965.02	\$48,141.92	60%
2005	21	21	21	\$119,145.91	\$118,814.71	\$0.00	\$118,814.71	\$108,469.05	\$10,345.66	91%
2004	20	20	20	\$93,009.35	\$93,009.35	\$0.00	\$93,009.35	\$0.00	\$93,009.35	0%
2003	20	20	20	\$91,291.83	\$86,237.07	\$0.00	\$86,237.07	\$83,922.51	\$2,314.56	97%
2002	2	2	2	\$86,063.28	\$71,265.61	\$0.00	\$71,265.61	\$69,215.96	\$2,049.65	97%
2001	23	23	23	\$102,896.24	\$101,261.72	\$0.00	\$101,261.72	\$93,789.20	\$7,472.52	92%
2000	1	0	0	\$63,018.38	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	0%
1999	1	0	0	\$63,710.79	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	0%
1998*	1	1	1	\$73,888.49	\$110,532.73	\$0.00	\$110,532.73	\$98,986.53	\$11,546.20	90%

The Auburn School District is located in the greater Puget Sound area. They have received P2 funding one [1] times within the past 16 years. Their average District Discount Percentage ranges from 53% [1998] to 74% currently.

Steilacoom Historical School District BEN: 145276

Steilacoom Historical School District is located in the greater Puget Sound area and has one school on Anderson Island [Puget Sound]. Steilacoom Historical School district has never applied for P2 funding. Their average District Discount Percentage ranges from 46% [1998] to 49% currently. Anderson Island School is currently an 80% discount school.

Applicant: STEILACOOM HIST SCHOOL DIST 1
Billed Entity: 145276

FY	Req. FRNs	Funded FRNs	486 on File	Requested Amount	Committed Priority 1	Committed Priority 2	Total Committed	Total Disbursed	Remaining Balance	UOL %
2014	5	0	0	\$67,954.87	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	0%
2013	6	6	6	\$64,726.02	\$63,783.20	\$0.00	\$63,783.20	\$0.00	\$63,783.20	0%
2012	7	7	7	\$115,252.83	\$115,252.83	\$0.00	\$115,252.83	\$109,407.30	\$5,845.53	95%
2011	11	11	11	\$47,840.20	\$48,936.88	\$0.00	\$48,936.88	\$34,856.15	\$14,080.73	71%
2010	8	8	8	\$42,069.65	\$47,650.91	\$0.00	\$47,650.91	\$18,153.58	\$29,497.33	38%
2009	8	8	8	\$33,294.68	\$32,777.47	\$0.00	\$32,777.47	\$29,536.73	\$3,240.74	90%
2008	8	8	8	\$36,406.60	\$32,104.88	\$0.00	\$32,104.88	\$21,398.13	\$10,706.75	67%
2007	0	0	0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	0%
2006	0	0	0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	0%
2005	4	3	0	\$6,013.80	\$4,252.68	\$0.00	\$4,252.68	\$0.00	\$4,252.68	0%
2004	7	6	6	\$7,164.53	\$6,444.60	\$0.00	\$6,444.60	\$0.00	\$6,444.60	0%
2003	7	6	5	\$7,280.11	\$1,909.61	\$0.00	\$1,909.61	\$0.00	\$1,909.61	0%
2002	6	6	6	\$7,946.42	\$7,672.32	\$0.00	\$7,672.32	\$6,181.92	\$1,490.40	81%
2001	0	0	0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	0%
2000	21	8	8	\$443,175.24	\$16,099.36	\$0.00	\$16,099.36	\$460.80	\$15,638.56	3%
1999	6	4	4	\$22,246.71	\$16,052.79	\$0.00	\$16,052.79	\$8,130.22	\$7,922.57	51%
1998*	4	0	0	\$775,700.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	0%

Conclusion

In the latest NRPM it states on page 4: “6. Commenters to this proceeding have made clear the importance of focusing E-rate support on high-speed connectivity to and within schools and libraries.¹³ As educational technology has improved in recent years, equipment and cabling used to deploy the interior pieces of broadband networks have become increasingly important, yet the E-rate program has provided less support and funded fewer applicants seeking support for such internal connections. Numerous commenters have identified support for internal connections as one of the program areas where modernization is most urgent and most important. Accordingly, in this section we ask about methods to improve this funding going forward.

We also take this opportunity to ask about improvements to the existing priority one funding system for last-mile deployments for high-capacity broadband.”

American e-Rate Solutions commends the Commission for launching this timely rulemaking on this most essential program. The E-Rate Program has enjoyed 17 years of excellent success, however it has created the “have” and “have not” in the digital divide. More can be done and should be done to help schools like Orting School District or Pullman School District increase their LAN/WAN bandwidth. We either need to move some of the infrastructure upgrades to P1 funding pot of monies or preserve some of the P1 funding needed for these school districts. Steilacoom Historical School Districts has a small but necessary school on Anderson Island that has DSL as its broadband connection – this is the only option available today for this school. What will happen to its ability to be on the Internet highway, if they lose funding for this service? I think it is clear that here in Washington State the need to have access to P1 and P2 funding is critical to our schools having the infrastructure necessary to meet the Connect Ed initiative and meet the NCLB Law as well as mandate testing. Many schools will never qualify for P2 funding and thus are reliant on P1 funding to help them bridge the budget gap to make P2 projects happen.

On page 5 of the NPRM:

1. Scope of Services to Be Funded

11. Under this approach, only equipment and supporting software that is essential to getting high-capacity broadband from the building’s front door to the computer, tablet, or other learning devices in schools and libraries would be eligible for internal connection support. We seek comment on what equipment is essential for such purposes. Some commenters have suggested that such equipment includes internal wiring, switches and routers, wireless access points, and the software supporting these components.¹⁹ We seek comment on whether these are the right categories of equipment and software to fund for this purpose.

It is essential that we keep funding for cabling – how else will the Internet reach the classroom? We need routers and switches. I disagree with funding email servers, phone servers. I think these should be eliminated as there are “free” email hosted services such as Google and Microsoft Office 365 for email and phone servers are not necessary for Internet connections. With the successful launches of Hosted VoIP Phone Solutions, many schools and libraries could benefit from this service/solutions however school districts like Orting School District, in Washington, would never be able to have this type of service due to their antiquated infrastructure and lack of qualifying for P2 funding sources.

There is a mention of “Rotating Eligibility on page 6 of the NPRM, I think this may work – I would suggest you start at the bottom and work your way up to the 90% school districts and make it a “one time shot” funding experience. This would need to be announced well before the window of opportunity opens to allow the little “I have never filed” school districts an opportunity to gather their wits about them and file their tech plans and file their forms correctly.

I believe by far that the Annual Allocation for Internal Connections mentioned on page 7, is by far the fairest route that the FCC could and should take to spread the wealth of the P2 funding dollars. I agree fully with the Funds for Learning approach on this funding model.

Page 9 of the NPRM addresses the reduction of services, I hope and pray that the FCC looks long and hard at the schools in Washington State and really address their concerns as well as their needs when it comes to P1 funding commitments. Fiber must remain eligible for E-Rate funding as it has proving to be the best investment for schools and libraries in receiving high-speed broadband capacity. Perhaps the FCC could ask the service providers why the rates are so high, and why the monthly recurring costs do not reduce after a few years of service. There seems to be a view point from many service providers that this continued high rate is ok. It also seems that it is the applicant that is held accountable for most everything that is E-Rate related. Why is that? Even with the idea of Lowest Cost of service – the applicant is not the expert in this area, but the service providers are and yet, the applicant is held accountable for their lack of integrity.

On page 11 of the NPRM, you suggest that Consortium purchasing or bulk buying is cost effective and affordable. I think over all – yes, however there are issues with this thought process also. For instance, I helped with one of Washington State’s consortiums recently as far as instructing them on the proper way to file for E-Rate. What I found was a lack of knowledge of how to file, what is eligible, how to collect accurate data on the services [Telecommunication Services only] one of the main reasons is that it involved several service providers throughout the state of Washington [small service providers to giant service providers]. Several school districts that I know of, have recently left the consortiums here in Washington because ;1) lack of understanding how the constoruium bills them, 2) Admin Fee 3) lower cost going directly to the service provider, 4) they receive their E-Rate discount rate vs. Consortium Discount rate. I believe it is like comparing my savings at Costco to Safeway purchases. There are times when I do save money by shopping at Costco and other times I can find the items I want to purchase cheaper elsewhere.

I would like to encourage the FCC is streamline the E-Rate filing process as well as make all forms available on-line. This includes the Form 500. Why have only part of the program on-line and other forms having to be filed via paper and mailed in? There is much work to be done still with the servers that host the databases for the Form 471 and Item 21 attachments. It is unacceptable that they should be crashing during the filing window and dumping all the hard work applicants are putting into creating the Form 471 or on-line Item 21 attachment while trying to meet the 8:59 PM deadline [Pacific Coast Time]. It is incredibly frustrating to have this happen the last two-three days of the open window. There is also the issue of all the letters that are mailed out from USAC to the applicant and service providers. At 40 cents per envelope and the cost of printing out the letters, one cost saving measure should be to send these types of correspondence via email and/or fax. This alone could save the programs a bundle of money that could be poured back into the E-Rate Funding pot.

A. Reduced E-rate Support for Voice Services

41. One way for the Commission to phase out support for voice services would be to gradually reduce the discount rate applicants receive for voice services. For example, the Commission could phase out support for voice services by 15 percentage points per year, beginning in funding year 2015, and continue to reduce support for such services by the same amount each year until funding for voice services is fully phased out in funding year 2020.⁶¹ We seek comment on this approach, as well as any other options for reducing E-rate spending on voice services. A gradual approach to reducing support for voice services should give schools and libraries time and the incentive to find lower priced solutions, and could also provide the Commission a period to evaluate whether it should adjust the phase out schedule. Although such an approach will result in some applicants receiving no support for voice services prior to funding year 2020, the most economically disadvantaged applicants — *i.e.* those that are currently eligible for a 90 percent discount rate — would be eligible for a 75 percent discount on voice telephony in funding year 2015, a 60 percent discount in funding year 2016, a 45 percent discount in 2017, a 30 percent discount in funding year 2018, and a 15 percent discount in funding year 2019.⁶²

As the schools that supplied testimonies in this letter indicated, losing support for P1 items will create even more of a hardship on the schools systems within Washington State, and I do not believe that this

is the only state that will see adverse financial situations if this actually happens and as I understood from the Education Technology Summit I attend, April 18-19, 2014, in Washington D.C. this is what the FCC is really considering doing. I can only say, please really think about this. I understand how important Broadband is to America and to the school and library systems however that being said, what is the cost of doing these improvement to the E-Rate system going to cost the schools and libraries you are trying to help? Will it be at the expense of teacher's jobs? Maybe transportation of students to schools?

Page 15-16 of NPRM:

44. We also seek comment on whether the entries for telephone services, telephone components, and interconnected VoIP in the Eligible Services List (ESL) include all of the types of voice services and components that should be covered by the five year phase out.⁷⁰ Are there any services in

these entries that should be excluded from the phase out? Are there other types of telephone services that are not specifically listed in the current ESL that should be subject to the phase out? Commenters should provide details on the specific voice services for which support should be phased out and provide detailed reasons for why certain services should be included or excluded from the list of targeted voice services.

B. Alternatives

45. The Commission may also decide to eliminate voice more quickly or to modify in some other way the current approach to supporting voice services. Therefore, we also seek comment on a number of alternative ways to approach funding for voice services, and we invite comment on the approaches we identify below, as well as variations on or alternatives to any such options.

46. Elimination of voice support. As an alternative to a phase down of voice support, should the Commission consider eliminating all support for voice services starting in funding year 2015? Such an approach would more quickly accomplish the Commission's goal of transitioning the E-rate program to supporting high-capacity broadband, but would also result in a more stark loss of support for applicants. Would it be more appropriate to provide additional time for applicants to make necessary budgetary changes by eliminating all support for voice services, but in a later funding year?

47. Lower priority for voice services. In the alternative, we also seek comment on retaining support for voice services under a lower priority. For example, SECA recommends that the Commission establish a new priority category for particular services, including voice services, to be funded at a flat 50 percent discount and that all applicants have equal access to the services in this category.⁷¹ Would it be more manageable for applicants to adjust to a larger reduction in funding the first year we implement a discount reduction for voice services because they know they will continue to receive such funding in future years?⁷² If we were to take such an approach, would it encourage applicants to move to more cost-effective solutions or would we need to take additional steps to encourage such transitions?

48. Benchmark for VoIP support. As voice communications technologies migrate from traditional TDM to IP should the Commission encourage this transition for schools and libraries using the E-rate program? Some commenters suggested that rather than phasing out E-rate support for all voice services, the Commission should continue to provide support for VoIP solutions.⁷³ A possible middle ground would be for the Commission to identify inexpensive VoIP solutions for schools and libraries and use such services as a benchmark for how much support the E-rate program will provide for voice services.

American e-Rate Solutions believes that there must be some retention of voice services to the E-Rate Eligible Services List, such as PRI, T-1 lines, Trunk lines that are used for both Data and Voice services. American e-Rate Solutions believes that cellular phone services should be reduced to a limited number of phone lines per school district or library. Many school districts have gone away from E-Rate Funded Cellular phone service to Stipend-based phone services due to employee use of school district cellular phone for personal calls and the paper work that needs to be tracked/filed for the employee to reimburse the school district for non-district related phone calls, text messages, data usage.

American e-Rate Solutions also supports the elimination of the following P1 services:

- Long Distance Phone Service
- Email Services
- Pager Services

- 800 Services
- Radio Loop
- POTS lines
- Phone Calling Cards
- 900\976 Call Blocking Service
- Text Messaging
- Custom Calling Services
- DID
- Directory Assistance Charges
- Inside Wire Maintenance Charges
- Voice Mail Services

From the Priority 2 Services Eligible list we recommend the elimination of the following components:

- Memory [RAM]
- Network Interface Cards [NIC]
- Hubs
- Email Server
- Telephone Components in its entirety – PBX, Key System, VoIP telephony Equipment, etc.
- Basic Maintenance of Internal Connections

Sincerely,
Jill Stone

CEO
American e-Rate Solutions